

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

**KAREN IOVINO,**

Plaintiff,

v.

**MICHAEL STAPLETON ASSOCIATES, LTD.  
d.b.a. MSA SECURITY, INC.**

Defendant.

CASE NO. 5:21-cv-00064

**PLAINTIFF'S MOTION TO STAY PROCEEDINGS PENDING COLLATERAL ORDER  
APPEAL TO THE FOURTH CIRCUIT**

Plaintiff, Karen Iovino, through her undersigned counsel, hereby respectfully moves that this Court enter an order staying further proceedings in this matter, except those related to the Court's Order to Show Cause for failure to follow professional standards (ECF No. 178), until the U.S. Court of Appeals for the Fourth Circuit has ruled on her appeal of (1) Judge Cullen's July 24, 2024 Order (ECF No. 177) affirming and overruling Plaintiff's Rule 72(a) Objection to Magistrate Judge Hoppe's Order; and (2) the May 23, 2024 Order (ECF No. 172) by Magistrate Judge Hoppe granting Defendant's Motion for Protective Order, and awarding such other relief that this Court finds necessary and proper. Contemporaneous with this Motion, Plaintiff is filing a Memorandum in support of this Motion.

Respectfully Submitted,

/s/ Thad M. Guyer

Thad M. Guyer

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### **CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record, and to:

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